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Item Number: 480

Addendum StartPage: 0

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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
ELECTRIC POWER COMPANY FOR § OF  
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

**CITIES ADVOCATING REASONABLE DEREGULATION'S  
STATEMENT OF POSITION**

The Cities Advocating Reasonable Deregulation ("CARD") file this statement of position. CARD takes the positions set out in the pre-filed testimony of its witnesses, Mr. David Garrett, Mr. J. Randall Woolridge, Ph. D., Mr. Scott Norwood, Mr. Mark Garrett, Mr. Karl Nalepa, and Ms. Catherine Webking.

Additionally, CARD concurs in many of the recommendations of Staff and intervenor witnesses on revenue requirement issues and reserves the right to participate on those issues at the hearing. Southwestern Electric Power Company bears the burden of proof in this proceeding on all issues. CARD continues to evaluate the other parties' testimonies and reserves the right to participate at the hearing and to take positions based on the evidence adduced.

Respectfully submitted,

**HERRERA LAW & ASSOCIATES,  
PLLC**

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480

By: /s/Brennan J. Foley  
Brennan J. Foley

**ATTORNEYS FOR CITIES  
ADVOCATING REASONABLE  
DEREGULATION**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 14th day of May, 2021, a true and correct copy of the foregoing document was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Leslie Lindsey  
Leslie Lindsey